

000025767

CORRES. CONTROL
OUTGOING LTR NO.

DOE ORDER # 4700.1
94 RF 06331

DIST.	LTR	ENC
AMARAL, M.E.		
BERMAN, H.S.		
BANCH, D.B.		
CARNIVAL, G.J.		
COPP, R.D.		
DAVIS, J.G.		
FERRERA, D.W.		
HANNI, B.J.		
HARMAN, L.K.		
HEALY, T.J.		
HEDAH, T.		
HILBIG, J.G.		
HUTCHINS, N.M.		
KELL, R.E.		
KIRBY, W.A.		
KUESTER, A.W.		
MAHAFFEY, J.W.		
MANN, H.P.	X	
MARX, G.E.		
MCDONALD, M.M.		
MCKENNA, F.G.		
MONTROSE, J.K.		
MORGAN, R.V.		
POTTER, G.L.		
PIZZUTO, V.M.		
RISING, T.L.		
SANDLIN, N.B.		
SETLOCK, G.H.		
STEWART, D.L.		
STIGER, S. G.	X	
SULLIVAN, M.T.		
SWANSON, E.R.		
WILKINSON, R.B.	X	
WILSON, J.M.		
ANT, R.D.		
JOSE	X	
PRIMROSE	X	
SCHUBB	X	

PATS/T133G
File (2)

22

2

3PM Action Tracking
Admin. Record 080

22

2

Correspondence Control

X

X

CLASSIFICATION:

JCNI

UNCLASSIFIED

CONFIDENTIAL

SECRET

AUTHORIZED CLASSIFIER
SIGNATURE

DATE

REPLY TO RFP CC NO:

CTION ITEM STATUS

☐ OPEN

☐ CLOSED

☐ PARTIAL

APPROVALS:

S: PAU: NF

SIGNATOR & TYPIST INITIALS

LS:lm

46469 (Rev. 3/94)

EG&G ROCKY FLATS

EG&G ROCKY FLATS, INC.
ROCKY FLATS PLANT, P.O. BOX 464, GOLDEN, COLORADO 80402-0464 • (303) 966-7000

June 13, 1994

94-RF-06331

Jessie M. Roberson
Acting Assistant Manager for
Environmental Restoration
DOE/RFFO

PROPOSAL FOR EXPEDITING THE RECORD OF DECISION (ROD) PROCESS FOR ROCKY FLATS
PLANT OPERABLE UNIT (OU) 15, INSIDE BUILDING CLOSURES - SGS-353-94

The purpose of this correspondence is to propose a method by which OU 15 may be closed with a "No Action" ROD. EG&G Rocky Flats, Inc. (EG&G) recommends conducting a non-intrusive gamma survey and/or removing the paint from OU 15 Individual Hazardous Substance Sites (IHSSs) and conducting direct radiological surveys (i.e., Closure Sampling) to determine if OU 15 IHSSs meet standards for release for unrestricted use. EG&G anticipates that most, if not all, of the OU 15 IHSSs will meet these standards and that a No Action ROD could then be used to close OU 15. In addition, provided that the regulatory agencies and the Department of Energy/Rocky Flats Field Office (DOE/RFFO) agree to a very aggressive schedule for review and comment on OU 15 documents, a ROD for OU 15 may be adopted during 1995.

Per the Environmental Protection Agency's (EPA's) comments (May 4, 1994) on the Phase I RCRA [Resource Conservation and Recovery Act] Facility Investigation/Remedial Investigation (RFI/RI) Work Plan draft Field Sampling Plan Technical Memorandum (TM) 1 for OU 15, "Radiological sampling and survey data does not characterize the nature and extent of contamination that may be present underneath or imbedded in painted surfaces," and "The data is therefore insufficient to address risk posed in a unrestricted industrial/ commercial use scenario nor does it allow us to verify achievement of standards." EG&G recommends that OU 15 be closed with a No Action ROD using an unrestricted use scenario in conjunction with Closure Sampling, Unrestricted Use Criteria (already established), and risk evaluations similar to those presented within Final TM 1 if necessary.

EG&G does not recommend that an Interim Measure/Interim Remedial Action (IM/IRA) be performed for a restricted use scenario, despite the fact that three of OU 15 buildings (Buildings 865, 883 and 447) are currently scheduled for economic development. EPA suggests within their comments on Draft TM 1 for OU 15 that an IM/IRA process be used as follows: "Sampling data is sufficient to evaluate the risk or dose rates to radiological workers in a radiological work setting" and "If radiological work continues, the controls in place to assure safety of radiological workers will need to be identified and approved as an IM/IRA."

61100

REVIEWED FOR CLASSIFICATION/UCM

BY G. E. Oschick

DATE 4-17-95

Jessie M. Roberson
June 13, 1994
94-RF-06331
Page 2

Closure Sampling recommended by EG&G is not within the scope of the Phase I RFI/RI Work Plan for OU 15 and must be authorized by DOE/RFFO. In addition, in order for a ROD to be adopted during 1995, DOE/RFFO must commit with the regulatory agencies to a very aggressive schedule for OU 15.

Please respond with authorization for EG&G to conduct Closure Sampling and to pursue a No Action ROD for OU 15. If you have questions regarding this correspondence, please contact Dennis L. Schubbe at extension 8709.



S. G. Stiger
Associate General Manager
Environmental Restoration Management
EG&G Rocky Flats, Inc.

DLS:jlm

Orig. and 1 cc - J. M. Roberson

cc:

W. Fitch	-	DOE/RFFO
M. H. McBride	-	" "
R. J. Schassburger	-	" "
M. N. Silverman	-	" "
L. W. Smith	-	" "